

REMARKS/ARGUMENTS

Status of the Claims

Before this Amendment, claims 1-14 and 16-25 were pending in the present application. Claims 1 and 16 have been amended. Claim 15 was previously canceled without prejudice and without disclaimer. Claims 23-25 are canceled without prejudice and without disclaimer. No claims have been added. Accordingly, claims 1-14 and 16-22 remain pending in the present application after entry of this Amendment.

The Office Action ("Office Action") has rejected claims 1-4 under 35 U.S.C. §103(a) as being unpatentable over the cited portions of Oeda, U.S. Patent Pub. 2001/0029502 ("Oeda") in view of the cited portions of Church et al., U.S. Patent 5,794,234 ("Church") and in view of the cited portions of Rhoads, U.S. Patent Pub. 2003/0142847 ("Rhoads"). The Office Action has rejected claims 5-6 and 12 under 35 U.S.C. §103(a) as being unpatentable over the cited portions of Oeda, Rhoads, and Church, and further in view of the cited portions of Williams et al., U.S. Patent 5,845,283 ("Williams"). The Office Action has rejected claims 7-9 under 35 U.S.C. §103(a) as being unpatentable over the cited portions of Oeda, Rhoads, and Church, and further in view of the cited portions of Bruce Schneier, Applied Cryptography ("Schneier"). The Office Action has rejected claims 10-11, 16-18 and 23-24 under 35 U.S.C. §103(a) as being unpatentable over the cited portions of Oeda, Rhoads, and Church, and further in view of the cited portions of Tamaki et al., U.S. Patent Pub. 2002/0059427 ("Tamaki"). The Office Action has rejected claims 19-20 under 35 U.S.C. §103(a) as being unpatentable over the cited portions of Oeda, Rhoads, Tamaki, and Church, and further in view of the cited portions of Williams. The Office Action has rejected claims 13-14 under 35 U.S.C. §103(a) as being unpatentable over the cited portions of Oeda, Rhoads, and Church, and further in view of the cited portions of Williams et al., U.S. Patent Pub. 2005/0021969 ("Williams '969"). The Office Action has rejected claims 13 and 21 under 35 U.S.C. §103(a) as being unpatentable over the cited portions of Church, Rhoads, Oeda, and Tamaki, and further in view of the cited portions of Williams '969. The Office Action has rejected claim 25 under 35 U.S.C. §103(a) as being unpatentable over the

cited portions of Oeda, Rhoads, Church, and Tamaki, and further in view of the cited portions of Schneier.

Claim Amendments

Claims 1 and 16 have been amended to recite a “signature file.” Support for these amendments may be found throughout the specification, for example at ¶ 0062 and Fig. 5. As such, no new matter is added by these amendments.

35 USC § 103(a) Rejections

The Office Action rejected independent claim 1 under 35 U.S.C. §103(a) as being unpatentable over the cited portions of Oeda, in view of the cited portions of Church and Rhoads. The Office Action also rejected independent claim 16 under 35 U.S.C. §103(a) as being unpatentable over the cited portions of Oeda, Church, and Rhoads, and further in view of the cited portions of Tamaki. To establish a *prima facie* case of obviousness, the cited references, combined with the knowledge of those of ordinary skill in the art, must teach or suggest all the claim limitations. Applicant respectfully traverses these rejections at least because the combination of the cited references with ordinary knowledge in the art fails to teach or suggest all the recitations of independent claims 1 and 16.

Specifically, the cited references fail to teach or suggest “receiving the encrypted data and the signature file...; determining whether the signature file is authenticated...; if the signature file is authenticated, decrypting the encrypted data; [and] converting the decrypted data from the first character-set format to a second character-set format,” as recited in claim 1. Claim 16 contains similar recitations. The Office Action correctly points out that “Oeda fails to teach ... signature receiving and verification,” mentioning only Rhodes as disclosing signature handling. Office Action, p. 4. Further, the Office Action cites no portion of either Church or Tamaki, or any other disclosure in the art, as teaching this recitation.

The Office Action cites Rhoads as teaching “a signature receiver and a signature checker,” by the mere mention in Rhoads that “header information is verified by signature codes

directly within the data.” Office Action, p. 4 (*citing* Rhoads, ¶ 0329). Even assuming, *arguendo*, that the cited portion of Rhoads discloses a signature receiver and a signature checker, Rhoads still fails to teach or suggest receiving separate encrypted data and signature files and decrypting the encrypted data if the signature file is authenticated, as recited in amended claims 1 and 16. In fact, Rhoads appears to teach away from using separate data and signature files by stating explicitly that the signature codes are *directly within the data*. One issue with placing the contents of a signature file “directly within the data” is the potential increase in system overhead if the signature data must be encrypted along with the other data. Another issue is a potential reduction in security by requiring all data to be decrypted in order to authenticate the signature data.

For at least these reasons, Rhoads fails to teach or suggest this recitation of amended claims 1 and 16. Further, the Office Action fails to provide any teachings from other references or any reason why this recitation would be within the knowledge of a person of ordinary skill in the art. As such, the combined teachings of the art, as cited by the Office Action, fail to teach or suggest all the recitations of claims 1 and 16 and fail to make a *prima facie* case of obviousness.

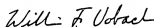
Applicant respectfully submits that independent claims 1 and 16 are allowable for at least the reasons given above. Claims 2 – 14 and 17 – 22 are believed to be allowable for at least the reason that they depend from allowable base claims. Applicant, therefore, respectfully requests that the §103(a) rejections to these claims be withdrawn.

CONCLUSION

In view of the foregoing, Applicant believes all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



William F. Vobach
Reg. No. 39,411

TOWNSEND and TOWNSEND and CREW LLP
Two Embarcadero Center, Eighth Floor
San Francisco, California 94111-3834
Tel: 303-571-4000
Fax: 415-576-0300
WFV:DJS:klb
61249334 v1